To: Gunale, Ashley

outside of the DRECP area.

Hingtgen, Robert J.: Patrick BROWN (Patrick, BROWN@soitec.com) (Patrick, BROWN@soitec.com) Cc:

Subject: RE: Soitech follow up

Friday, October 04, 2013 2:34:46 PM

Attachments:

image001.png CA CREZ Conceptual Transmission Segments Phase 2B final.pdf

Ashley,

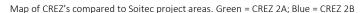
Here is our response to Mr. Silver's e-mail:

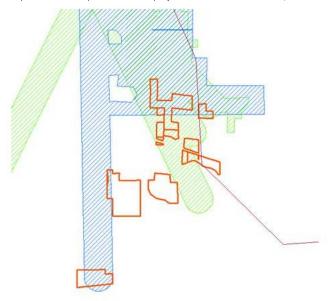
Mr. Silver references "Competitive Renewable Energy Zones" (CREZs), which were part of the California Energy Commission's (CEC) "Renewable Energy Transmission Initiative" (RETI) between 2008 and 2011. From what we can tell, the CEC's RETI process appears to have stalled in early 2011, and now appears to have been set aside by the Desert Renewable Energy Conservation Plan (DRECP) process. http://www.energy.ca.gov/reti/. As you know, we do not need to address the DRECP in the PEIR because the project areas are located entirely

For the County's reference, the RETI process identified necessary major updates to the California transmission system to access CREZs. The process identified CREZs that could be developed in the most cost effective and environmentally benign manner. Potential renewable energy projects were grouped into CREZs based on geographic proximity. The CREZ implicated in southern San Diego County is CREZ 27, San Diego South. Each CREZ was developed based on existing and proposed projects (e.g., those projects with a PPA, or PPA pending) and other projects or resources with a high potential of being developed. Because the Soitec projects were not yet proposed at the time of CREZ development (2008-2010), Soitec's projects were not accounted for in the CREZ, nor does CREZ 27 account for areas of high solar potential or the most cost-effective or environmentally-benign sites for future solar development.

Contrary to Mr. Silver's suggestion, whether Soitec's projects are in a CREZ or not does not "provide a presumption, at least, as to whether the project is appropriate sited or whether the presumption is in favor of an alternative site (that might not be pristine habitat in the East County MSCP preserve planning area)." The results of the RETI process were designed to pinpoint transmission projects that should be developed to connect renewable energy resources located in remote locations to the transmission grid, in order to ensure proposed projects could come online and help meet the state's 33% RPS goal. To that end, the economic and environmental implications of proposed renewable energy projects and necessary transmission corridors was taken into account in ranking proposed conceptual transmission segments. RETI did not broadly evaluate areas outside of proposed project sites and potential sites, like federal energy lease areas, to determine their value for future renewable energy development, such as other areas' proximity to transmission, energy resource potential, or environmental sensitivity.

Nevertheless, Soitec's proposed projects are complimentary to RETI's CREZ and conceptual transmission corridors for southern San Diego, as Soitec's project areas are located partially within CREZs, as Dudek's mapping shows, and are proximate to existing transmission. Furthermore, due to the careful siting of Soitec's projects, even when they are not fully located within a CREZ they are nevertheless environmentally benign, as they are not located within any identified sensitive environmental areas, such as those delineated on the CREZ maps as areas of critical environmental concern, potential desert wilderness, citizen's wilderness inventory, Mohave ground squire range or core population, sensitive cultural resource areas, wildlife linkages, proposed desert protection, proposed national monument, or wildlands conservancy.





Please let us know if you have any additional questions.

Thanks, Megan

Megan Lawson, LEED AP ND 760.479.4243

----Original Message-----

From: Gungle, Ashley [mailto:Ashley.Gungle@sdcounty.ca.gov]

Sent: Wednesday, October 02, 2013 8:30 AM

To: Megan Lawson
Cc: Hingtgen, Robert J
Subject: EW: Soitech follow u

Subject: FW: Soitech follow up

Hi Megan,

Dan Silver with the Endangered Habitat League (EHL) provided us with the following information on CREZ zones. Do you have any information on CREZ zone and whether they are applicable to San Diego? If not, can you please research this and determine if it is something we need to address further?

Thanks,

Ashley

----Original Message-----

From: Dan Silver [mailto:dsilverla@me.com] Sent: Tuesday, October 01, 2013 12:46 PM

To: Fogg, Mindy; Hingtgen, Robert J; Gungle, Ashley

Subject: Soitech follow up

Dear Mindy, Robert, and Ashley

Thank you again for your time.

After talking to an expert on distributed energy, I am more fully cognizant of the complexities in terms of energy policy and economics. The goal for everyone would be, of course, to have a systematic approach in place rather than a piecemeal, project-by-project process. To that end, I understand that the State has done some prioritization work, identifying locations with good economics for renewable energy but also with lower environmental cost. These are called CREZ zones. If these zones are in place in San Diego, it might provide a presumption, at least, as to whether the project is appropriate sited or whether the presumption is in favor of an alternative site (that might not be pristine habitat in the East County MSCP preserve planning area). I'm not sure the links I was able to quickly locate are of much value, but I provide them for your reference, and maybe the applicant can shed more light.

With best regards Dan

http://www.energy.ca.gov/reti/

http://www.nationalwind.org/assets/blog/AnneGillette.pdf

 $\underline{\text{http://www.energy.ca.gov/reti/documents/phase2B/Southern\%20CA_CREZ_Conceptual_Transmission_Segments_New_and_Existing_Corridors.pdf}$

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